

Michael Kind, Esq.  
Nevada Bar No. 13903  
**KAZEROUNI LAW GROUP, APC**  
6069 South Fort Apache Road, Suite 100  
Las Vegas, NV 89148  
Phone: (800) 400-6808 x7  
mkind@kazlg.com

David H. Krieger, Esq.  
Nevada Bar No. 9086  
**HAINES & KRIEGER, LLC**  
8985 S. Eastern Avenue, Suite 350  
Henderson, NV 89123  
Phone: (702) 880-5554  
dkrieger@hainesandkrieger.com  
*Attorneys for Plaintiff Thomas A. O'Connell*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Thomas A. O'Connell,  Plaintiff,  v.  American Express Company, Bank of America, JPMorgan Chase Bank, NA, Franklin Capital Corporation, Shell/CBNA,	Case No.: 2:18-cv-00743-RFB-CWH  <b>Stipulation for an extension of time for Plaintiff to Respond to Defendant's Motion to Dismiss [ECF No. 27]</b>  <b>(Second Request)</b>
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Plaintiff Thomas A. O'Connell ("Plaintiff") and Bank of America ("Defendant"), by and through their respective counsel, hereby submit this stipulation for an extension of time—until **August 1, 2018**—for Plaintiff to respond to Defendant's Motion to Dismiss Plaintiff's Complaint, filed on June 20, 2018, ECF No. 27. Plaintiff's Response is currently due on July 18, 2018.

1 In good faith and not for the purposes of delay, Plaintiff requested the  
2 extension to allow additional time for the parties to discuss resolution, since  
3 settlement discussions are still ongoing. Plaintiff is also considering requesting  
4 leave to amend the Complaint instead of opposing Defendant's motion. The Parties  
5 in good faith stipulate to allow additional time for Plaintiff to respond to the  
6 Motion. This is the second request for an extension of this deadline.

7 The Parties therefore stipulate that Plaintiff's response to Defendant's motion  
8 to dismiss, ECF. No. 27, shall be due on or before **August 1, 2018**.

9 DATED this 13th day of July 2018.

10 **KAZEROUNI LAW GROUP, APC**

11 By: /s/ Michael Kind  
12 Michael Kind, Esq.  
13 6069 South Fort Apache Road, Suite 100  
14 Las Vegas, Nevada 89148  
*Attorneys for Plaintiff*

15 **Akerman LLP**

16 By: /s/ Rex Garner  
17 Rex Garner, Esq.  
18 1635 Village Center Circle, Suite 200  
19 Las Vegas, NV 89134  
*Attorneys for Defendant*

20 IT IS SO ORDERED:

21 

22 RICHARD F. BOULWARE, II  
23 United States District Court

24 DATED: July 16, 2018.

# CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on July 13, 2018, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

**KAZEROUNI LAW GROUP, APC**

By: /s/ Michael Kind

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Las Vegas, Nevada 89148